

# ***EXHIBIT 9***

***UNREDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED***

# ***EXHIBIT 9***

**From:** "Thomas E. Gorman" <TGorman@kvn.com>  
**To:** Leah Bijns [REDACTED]  
**Cc:** Kristinn Gudjonsson [REDACTED], Michael Pfy [REDACTED], April Beaupain [REDACTED], Robin Stearns [REDACTED], Kevin Vosen [REDACTED], Tom Lue [REDACTED], OTTO-KVN <OTTO-KVN@kvn.com>, "Jennifer A. Huber" <JHuber@kvn.com>, Gary Brown [REDACTED]  
**Subject:** Re: Drive Logs!  
**Sent:** Mon, 12 Sep 2016 16:59:44 +0000

Thanks, Leah. I'll ping them in a separate thread.  
--Tom

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**From:** Leah Bijns [REDACTED]  
**Date:** Monday, September 12, 2016 at 8:17 AM  
**To:** Thomas Gorman <TGorman@kvn.com>  
**Cc:** Kristinn Gudjonsson [REDACTED], Michael Pfy [REDACTED], April Beaupain [REDACTED], Robin Stearns [REDACTED], Kevin Vosen [REDACTED], Tom Lue [REDACTED], OTTO-KVN <OTTO-KVN@kvn.com>, Jennifer Huber <JHuber@kvn.com>, Gary Brown [REDACTED]  
**Subject:** Re: Drive Logs!

Hi Tom,

It doesn't look like there are any eDiscovery people on this thread. If you still need Drive docs pulled you should make that request directly to Ryan Blackhart [REDACTED] and Lori Aintablian [REDACTED] and they should be able to get that moving right away for you.

Thanks,  
Leah

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Leah Bijns | Global Security Investigations | [REDACTED]

On Sun, Sep 11, 2016 at 11:03 AM, Gary Brown [REDACTED] wrote:

That is indeed where all the IDs live, which is what I've been previously told is the preferred method for eD ingestion. I removed the IDs from the human readable spreadsheet to make them less cluttered, but if the eD tools encounter difficulties resolving titles and ownership back to original docs, I can take a crack at providing just the IDs for the subset of items of interest.

On Sat, Sep 10, 2016 at 1:35 PM Thomas E. Gorman <TGorman@kvn.com> wrote:  
(+Jen Huber @ KVN)

I don't think I received a response on this one. We need to collect some files so that we can investigate possible trade secret misappropriation. This is a high-priority project for our investigation.

I've highlighted rows in the following spreadsheets (exports of docs, trix, and presentations):

[REDACTED]  
[REDACTED]  
If I understand how Gary organized these, the DocIDs are in this folder: [REDACTED]  
[REDACTED]

Please let me know if you have any questions.  
Thanks!  
--Tom

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**From:** Thomas Gorman <TGorman@kvn.com>

**Date:** Tuesday, September 6, 2016 at 8:13 PM

**To:** Gary Brown [REDACTED] Michelle Ybarra <MYbarra@kvn.com>, Leah Bijmens [REDACTED]

**Cc:** Kristinn Gudjonsson [REDACTED] Rachael Meny <Rmeny@kvn.com>, Michael Pfyl [REDACTED]  
[REDACTED] April Beaupain [REDACTED] Robin Stearns [REDACTED] Kevin Vosen [REDACTED] Tom Lue [REDACTED]

**Subject:** Re: Drive Logs!

Discovery Team:

I think there's some confusion. Gary is referring to a different request from the spreadsheets that we highlighted before. Gary ran a set of reports on Drive activity—different from Kristinn's earlier analysis--and I'm grinding through Gary's reports to identify potentially interesting download/copy activity.

This is the first one that I've analyzed. The interesting activity is highlighted. Magenta is P0, pink is P1, yellow is P2.

Can someone please pull those files? And please let me know where I should direct similar queries in the future, as Gary has given me several more interesting reports that I'll be working through in the coming days.

Thanks,

--Tom

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**From:** Gary Brown [REDACTED]

**Date:** Friday, September 2, 2016 at 2:19 PM

**To:** Michelle Ybarra <MYbarra@kvn.com>, Leah Bijmens [REDACTED]

**Cc:** Kristinn Gudjonsson [REDACTED] Rachael Meny <Rmeny@kvn.com>, Michael Pfyl [REDACTED]

[REDACTED] April Beaupain [REDACTED] Robin Stearns [REDACTED] Kevin Vosen [REDACTED] Thomas Gorman <TGorman@kvn.com>

**Subject:** Re: Drive Logs!

Any eDiscovery folks on this thread who can pull the docs Thomas highlighted in the spreadsheets?

On Tue, Aug 30, 2016 at 12:00 PM Michelle Ybarra <MYbarra@kvn.com> wrote:

+Tom (KVN)

Gary, are you free today for a brief chat with Tom and me to discuss the drive logs you circulated yesterday? We have a few questions – shouldn't take long.

Tom and I are free at 2:30 if that works for you.

Thanks,

Michelle

**From:** Gary Brown [mailto:[REDACTED]]

**Sent:** Monday, August 29, 2016 10:11 PM

**To:** Leah Bijmens

**Cc:** Michelle Ybarra; Kristinn Gudjonsson; Rachael Meny; Michael Pfyl; April Beaupain; Robin Stearns; Kevin Vosen

**Subject:** Re: Drive Logs!

External shares have been added to the folder, and I've made the sheets a bit friendlier as it occurred to me that most people won't be viewing these in a terminal. Let me know if there are any questions.

On Mon, Aug 29, 2016 at 7:01 PM Gary Brown [REDACTED] wrote:

Indeed. The "CSVs of Doc IDs" folder has lists of IDs, separated by action, for fast ingestion, and a master legend of all the IDs and their corresponding human readable names.

On Mon, Aug 29, 2016 at 4:52 PM Leah Bijmens [REDACTED] wrote:

Thanks, Gary - Sounds like we also eDiscovery to pull any of these listed here that KVN would like to review the content of?

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Leah Bijmens | Global Security Investigations | [REDACTED]

On Mon, Aug 29, 2016 at 4:48 PM, Gary Brown [REDACTED] wrote:

For clarification, these are just names. Also, coming later tonight is a human readable version of share invitations.

On Mon, Aug 29, 2016, 16:38 Gary Brown [REDACTED] wrote:

I granted Michelle and Thomas access.

On Mon, Aug 29, 2016, 16:34 Michelle Ybarra <[MYbarra@kvn.com](mailto:MYbarra@kvn.com)> wrote:

Leah – Unless the volume is unworkable, our team can look at the files. But we don't have access to what Gary shared yet.

Gary – we definitely want to see what Anthony exported in the days prior to his exit.

**From:** Leah Bijmens [mailto:[REDACTED]]

**Sent:** Monday, August 29, 2016 4:21 PM

**To:** Gary Brown

**Cc:** Kristinn Gudjonsson; Rachael Meny; Michelle Ybarra; Michael Pfyl; April Beaupain; Robin Stearns; Kevin Vosen

**Subject:** Re: Drive Logs!

+ Robin as FYI

**Gary**, can you confirm I am interpreting these correctly

- [trix/docs\\_exports\\_human\\_readable.csv](#) = all exports of Drive docs and trix to the company computer by the corp LDAP
- [trix/docs\\_copies\\_human\\_readable.csv](#) = all copies of Drive docs and trix to the company computer by the corp LDAP

**Rachael/Michelle** - does your team want to take a first look at these files and flag anything that appears concerning.

**Kevin** - I think someone on the business side will ultimately need to make the decision if the activity/content is concerning. Possibly Dmitri?

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Leah Bijmens | Global Security Investigations | [REDACTED]

On Mon, Aug 29, 2016 at 3:54 PM, Kevin Vosen [REDACTED] wrote:

+ Rachael, Michelle, Michael, Leah and April

How do you all suggest we staff this?

On Mon, Aug 29, 2016 at 3:45 PM, Kristinn Gudjonsson [REDACTED] wrote:

[+Kevin Vosen](#)

Kevin, can you find someone to start reviewing these records?

On Mon, Aug 29, 2016 at 3:35 PM Gary Brown [REDACTED] wrote:

Parent folder within mater: [REDACTED]

The "Raw" folder contains sqlmr and dremel output that yielded this data, as well as notes about how I manipulated it.

The CSVs of Doc IDs folder contains IDs by action type for eDiscovery consumption, as well as the master 1410-item DocID to Name resolution sheet.

Requests:

- interested parties to look over copy/export human readable sheets, which is structured as follows: (timestamp of action, actor, title, creation date / original owner)

- interviews with [REDACTED] and [REDACTED] the two large exporters who are still around
- does anyone care about [REDACTED] and [REDACTED] large exports, as well as what anthonyl@ exported in the days prior to his exit?

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with regards

Kristinn

p.s most likely cause for all spleling mistakes in this email results from it being written by large thumbs on a tiny mobile screen... otherwise they were written on a real keyboard and I've got no excuses

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Kevin Vosen  
[REDACTED]